

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JACKSON LEWIS LLP
Attorneys for Defendants
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ATTORNEYS OF RECORD FOR DEFENDANT:
FELICE B. EKELMAN, ESQ.
DAVID S. KIM, ESQ.

RICHARD CURASI, individually and on behalf
of those similarly situated,

Plaintiffs,

vs.

HUB ENTERPRISES, INC., a Louisiana
corporation; and DOES 1 through 10, inclusive,

Defendants.

VIA ECF

Civil Action No.: 11-CV-2620

Seybert, J.
Tomlinson, M.J.

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, and upon all prior pleadings and proceedings herein, the undersigned, counsel for Defendant Hub Enterprises, Inc. will move this Court, the United States District Court for the Eastern District of New York, 100 Federal Plaza, Central Islip, New York 11722, on a date and time to be determined by the Court, for an order dismissing Plaintiff's Complaint in its entirety pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and for such other and further relief as this Court may deem just and proper.

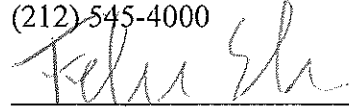
PLEASE TAKE FURTHER NOTICE that pursuant to Local Rule 6.1(b) of the United States District Court for the Eastern District of New York, answering papers, if any, shall be served within fourteen (14) days after service of the papers herein.

Dated: New York, New York
July 26, 2011

Respectfully submitted,

JACKSON LEWIS LLP
ATTORNEYS FOR DEFENDANT
HUB ENTERPRISES, INC.
666 Third Avenue, 29th Fl.
New York, New York 10017
(212) 545-4000

By:

A handwritten signature in cursive script, appearing to read "Felice B. Ekelman", written over a horizontal line.

Felice B. Ekelman, Esq.
David S. Kim, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on this 26 day of July, 2011, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Eastern District's Local Rules, and/or the Eastern District's Rules on Electronic Service upon the following parties and participants:

NEIL H. GREENBERG, ESQ.
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DAVID S. KIM, ESQ.